

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ALASKA**

NORTHERN DYNASTY MINERALS  
LTD. and PEBBLE LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

U.S. ENVIRONMENTAL PROTECTION  
AGENCY,

Defendant.

Case No. 3:24-cv-00059-SLG

**DECLARATION OF TIMOTHY BRISTOL**

I, Timothy Bristol, state and affirm as follows:

1. I make this declaration in support of SalmonState's Motion to Intervene in the above-captioned litigation. I know these facts of my own personal knowledge and would competently testify to them if called as a witness in these proceedings.

2. I am the Executive Director of SalmonState, a program of the New Venture Fund. I have been in this position for eight years. My responsibilities include fundraising, personnel management, and overall operations.

3. SalmonState is a program sponsored by the New Venture Fund, a 501(c)(3) nonprofit. Our primary office is in Juneau, Alaska, and we have smaller offices in Anchorage and staff in Homer. SalmonState's mission is to ensure that Alaska remains a place where wild salmon thrive.

4. SalmonState has worked to oppose the proposed Pebble Mine since our inception eight years ago. The Bristol Bay watershed is home of the largest sockeye salmon fishery in the world and is the world's example of a place where wild salmon thrive. Our program goal for the region is to see the watershed managed with a priority for wild salmon propagation. The proposed Pebble Mine would damage crucial wild salmon habitat. We advocate for protecting the Bristol Bay watershed from incompatible industrial development, including the proposed Pebble Mine.

5. Specifically, SalmonState has worked to oppose the proposed Pebble Mine by communicating through multiple types of media, engaging in technical analysis, and using the regulatory and legal systems to advocate against the mine. We fully supported the U.S. Environmental Protection Agency's 404(c) Final Determination (Final Determination) that is challenged in this case because it protects the Bristol Bay watershed from large-scale mining, such as the proposed Pebble Mine, which would irreparably impact the area's wetlands, waters, and fish that depend on them.

6. Members of SalmonState's staff and advisory council, including myself, have spent significant time in the Bristol Bay watershed and would be harmed if the proposed Pebble Mine were permitted.

7. The Bristol Bay watershed's wild, productive, and lucrative salmon fishery represents exactly what SalmonState was founded to protect. If the proposed Pebble Mine were permitted, this remarkable fishery would be damaged, and Alaska residents and

visitors would lose a source of food, livelihood, and recreation. SalmonState and its supporters would be harmed by this loss.

8. SalmonState seeks to intervene in this lawsuit to ensure the Bristol Bay watershed continues to thrive and our interests in the region and its fisheries remain intact. As described above, we have engaged in this issue for over a decade. The Final Determination protects Bristol Bay from large-scale mining, such as Pebble Mine, that would cause irreparable harm. The relief that Plaintiffs seek—vacating the Final Determination—would potentially allow large-scale, harmful mining activities, such as the proposed Pebble Mine, to proceed in the future. This would harm SalmonState’s mission and our supporters’ interests in protecting the Bristol Bay watershed—one of the world’s largest remaining sockeye salmon fisheries.

9. SalmonState and our supporters have unique interests and concerns that will not be adequately represented by the U.S. Government. SalmonState has heavily invested in protecting Bristol Bay from the proposed Pebble Mine. It is one of our highest organizational priorities. We believe it is critical to defend the Final Determination and EPA’s finding that the proposed Pebble Mine poses unacceptable risks to the Bristol Bay watershed. We would therefore be harmed if Plaintiffs receive the remedy they seek—vacatur of the Final Determination. It is important for SalmonState to be involved in this lawsuit to ensure that our interests and our supporters’ interests are adequately protected and that the Final Determination is allowed to stand.

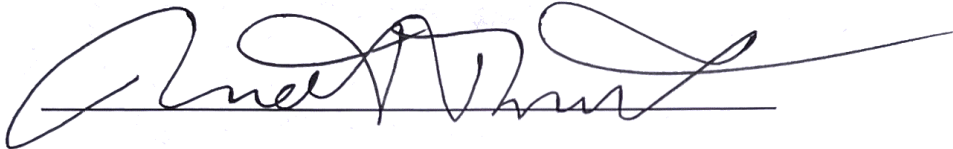
DECL. OF TIMOTHY BRISTOL

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on this 17<sup>th</sup> day of May, 2024 in Homer, Alaska.

A handwritten signature in dark ink, appearing to read 'Timothy Bristol', written over a horizontal line.

Timothy Bristol